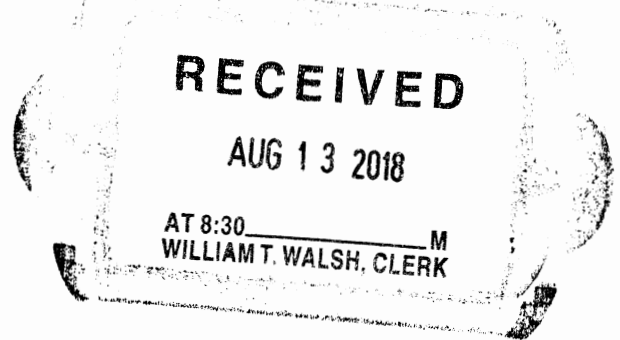


UNITED STATES DISTRICT COURT
DISTRICT COURT OF NEW JERSEY
CIVIL ACTION No:

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
Mitchell H. Cohen U.S. Courthouse, Room 1050,
1 John F. Gerry Plaza, 4th & Cooper Sts.,
Camden, N.J. 08101
Attn: Clerk/designee



HADDEN V STATE OF NEW JERSEY, Etc, et al

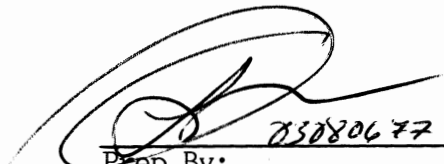
Dear Sir/Madam:

Within regard to the above captioned matter, I am the Plaintiff (pro-se) enclosed herein please find the original complaint and (11) eleven copies of same for each defendant. Please file same and return a copy to me for my records stamped received and filed upon filing same.

I thank you in advance for your anticipated courtesies and considerations in this and in all matters, I will furthermore await patiently for your response in this matter in a whole.


Tremaine Hadden

Dated: August 10, 2018


Prep By: 83080677

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Tremaine Hadden

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

State of New Jersey

Department Of Corrections

Tully house

Supervisor Aljune(TH), Individually and in his capacity

N.Easton, individually and in her capacity

Director Of Tully House, In his capacity

Dr. Abmar Shakir, individually and in his capacity

Dr. Donique Ivery, Individually and in her capacity

Geo Group, Inc

John does 1-5

Jane does 1-5

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>Tremaine Hadden</u>
	Street Address	<u>Southern State Correctional Facility</u>
	County, City	<u>4295 Route 47 Delmont</u>
	State & Zip Code	<u>New jersey, 08314</u>
	Telephone Number	<u>N/A</u>

RECEIVED

AUG 13 2018

AT 8:30
WILLIAM T. WALSH, CLERK

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name State Of new Jersey
 Street Address Office Of Attorney General
 County, City Mercer/Trenton
 State & Zip Code new jersey 08625

Defendant No. 2 Name Department Of Corrections
 Street Address Whittlesey Rd., P.O.Box 863
 County, City Mercer/Trenton
 State & Zip Code 08625

Defendant No. 3 Name Tully House
 Street Address 28 Peerless Place
 County, City Essex/Newark
 State & Zip Code 07101

Defendant No. 4 Name Supervisor Rjune
 Street Address 28 Peerless Place
 County, City Essex/Newark
 State & Zip Code 07101

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions ☐ Diversity of Citizenship
☐ U.S. Government Plaintiff ☒ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? Civil Violations (Denial Of Medical Treatment)

Cruel and unusual punishment, Failure to train effectively, etcal

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? On 4-27-18 while housed at Tully House a drug treatment for prisoners. Plaintiff @7:45pm was at the gym for recreation

B. What date and approximate time did the events giving rise to your claim(s) occur? During said time the Plaintiff injured his hand while playing basketball. Counselor Barnes took Plaintiff to his supervisor (Defendant Rjune) who was advised by Barnes that Plaintiff was injured while playing ball.

C. Facts: Plaintiff advised Defendant Rjune that he was in pain and he needed to see Medical personnel. Despite Plaintiff request he was denied by Rjune and sent to his room. Plaintiff later on that day again requested to be seen for Medical treatment. Defendant Rjune stated to Plaintiff there is no medical here and if I have to write any reports trust me it would be different from what he (Barnes) said earlier. Plaintiff informed defendant Rjune that he really need to be seen because his hand was in pain. At or around 9:40 that night Defendant Rjune came to Plaintiffs room and said I told you stop crying like a girl you wanna make me work now im gonna make your time fucked up. Plaintiff was removed from his room and placed in the holding area defendant stated they will be here for you to go to medical. defendant Rjune denied Plaintiff medical treatment, and caused serious harm to the Plaintiff by acting with his deliberate Indifference to plaintiffs health and safety. He failed to call anyone so that Plaintiff may receive medical attention which he did up until as he stated Plaintiff has gotten on his nerves. Plaintiff was picked up by DOC and was told that he was not going on a medical trip he was being taken back to prison with a charge for fighting with another person. Plaintiff advised the officers that he injured his hand earlier playing basket ball and had been asking for medical all day to no avail. Plaintiff was placed at EJSP where he again requested Medical for his hand which had by then swelled up. On 4/29/18 Plaintiff received a charge written by Tully House Counselor (Defendant Easton) alleging Plaintiff was involved with another in a fight. Defendant Easton placed false charges against Plaintiff only to assist her co-worker (Rjune)

Continued from pg3

Defendant Easton submitted false charges against the Plaintiff forcing him to be returned back to prison only because Plaintiff was requesting to be seen by Medical for his injured hand that he injured during recreation time at said program. Defendant Easton was in retaliation when she conspired with the Defendant Rjune to violate the Plaintiffs rights placing him in cruel and unusual position and purposely sending him back to prison. Defendant Easton was acting with deliberate indifference which caused the Plaintiff harm, Defendant Easton was not working on 4-27-18 (day of injury in gym) but she wrote the charge against the Plaintiff alleging she was present on the aforementioned date. The charges written by defendant (Easton) ended in Plaintiffs favor. Defendant Easton is being sued for her actions of violating plaintiffs rights under the eighth and fourteenth amendments. She also conspired with defendant Rjune to violate plaintiffs rights. She is being sued for monetary damages.

Defendant #1 is the employer for the defendants #2,7,8,10,11 Defendant #1 and 2 has a contract with Defendant #9, and 3. Defendant #3 is a treatment facility for State of New Jersey, and Department of corrections prisoners. In Defendant #3 contract (which they force inmates to sign) Defendant #3 indicates they are responsible for medical issues inmates may have and agrees to treat inmates with such treatment expeditiously when required. This contract is false and placed plaintiff in unusual position by their acts/inacts which caused the deliberate indifference to Plaintiffs health and safety. Plaintiff has and continues to suffer from a broken hand due to the defendants negligence. Defendant #3 does not have any medical department and/or any medical staff on their premises which is located in Newark, and the location where they take inmates for medical concerns would be Rahway prison. Prior to the present incident the Plaintiff and others wrote requests to manager Soberl and director Mr Morrison in regards to receiving medical treatment while housed in Tully such as inhalers, medications, KOP's, etc and no one responded... On May 1, 2018 #2 failed to adequately provide the Plaintiff with the appropriate treatment in a timely manner. Due to defendants negligence and failure to treat plaintiff he has permanent damages. On May 10, 2018 Defendant #7 failed to provide plaintiff with adequate medical treatment stating there is nothing he can do and he will not take no responsibility in this matter. Plaintiff was seen by #8 who was negligent when she reviewed and analyzed the injuries and failed to act diligently and accordingly. #8 informed plaintiff that this was an emergent matter but failed to proceed in an emergent manner, by the time plaintiff was seen by #8 the defendants were too late for appropriate treatment. The deliberate indifference caused the

continued from pg3

harm and led Plaintiff having a broken hand. Plaintiff is prohibited from involving himself with his usual and normal activities. Plaintiff is suing the defendants for their actions/inactions for monetary damages

Plaintiff requests a trial by jury, Plaintiff also request relief from Defendants namely #1, 2, #3 and 9 to come up with a location within their facility to have inmates to have access to medical care and treatment by licensed physicians (instead of having untrained, non licensed civilians handle medications ,etcal)...

Defendants #1 is the employer for #2,7,8,10,11 is being sued for these defendants actions/inactions as well as breaching the contract pursuant to #2,3 and 9 contractual agreement.

Defendant #2 is being sued for denial of medical treatment, failure to treat and cure his medical matter which led to a broken hand. Defendant #2 employs Defendants #7 and 8 who failed and denied plaintiff medical access.

Defendant # 3 is the employer for the defendants #4,5 and 6

Defendant #4 and 5 is being sued for conspiracy to violate plaintiffs rights, filing false reports and charges which were all terminated, expunged in favor of the Plaintiff. The defendant #5 was not at work when the original matter took place in gym while playing basketball (Confirmed by Counselor Barnes) and when she did come into work she wrote the false charges and plaintiff was returned to prison because he continuously asked for medical assistance. These two supervisors conspired to violate Plaintiffs rights.

Defendant #9 is the company in charge of Tully house and its employees.

Plaintiff seek monetary damages in the total amount of compensatory, punitive, nominal, attorney fees, court costs and any other relief the court deems proper and fit.

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. Broken hand, the treatment required was to rebrake the hand since the defendants failed to disregard and neglected to assist plaintiff in a timely manner. The treatment continues as of date.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

Plaintiff seeks a trial by jury, Monetary damages defendant to pay all medical bills, surgery bills, court costs, attorney fees, Punitive damages, compensatory damages and any other relief the court deems fit. Plaintiff also seek the tully house and geo group to place, hire and maintain licensed physician to assist inmates who are brought to their facilities as opposed to risk ones life by requiring staff to drive from said facilities all the way to prison close to program. The way they are doing it now clearly saves millions of dollars however it interferes with the inmates rights in multiple ways namely and more importantly the inmate is and should only be brought back to the prison if he has done something violative of the program. None of Geo facilities have adequate (if any at all) medical staff or Medical area.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 10 day of August, 2018.

Signature of Plaintiff Tremaine Hadden

Mailing Address SSCF 4295 Route 47
Delmont, N.J. 08314

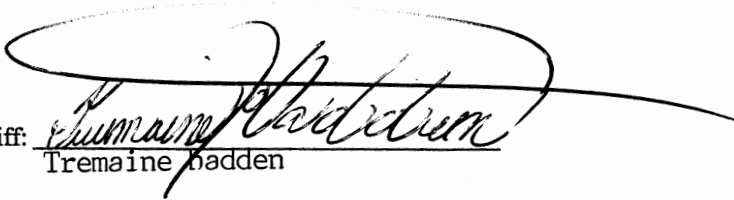
Telephone Number N/A

Fax Number (if you have one) _____

E-mail Address _____

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: _____


Tremaine Hadden